EXHIBIT No. 3

1   UNITED STATES DISTRICT COURT
             FOR THE WESTERN DISTRICT
2   ABINGDON DIVISION

3   ---------------------------------------
                                          :
4   KYMBERLY HOBBS, Administrator of   :
     the Estate of CHARLES JAMES GIVENS, :
5   :
                   Plaintiff,   :
6   :
     v.   : Civil Action No.
7   :   1:23cv00003
     ANTHONY RAYMOND KELLY, et al,   :
8   :
                   Defendants.   :
9   ---------------------------------------

10

11   DEPOSITION OF JEFFERY ARTRIP

12

13   July 31, 2024 - 10:00 a.m.

14

15

16

17

18

19

20

21

22

23   HALASZ REPORTING & VIDEO
           1011 E. Main Street, Suite 100
24   Richmond, Virginia 23219
               Phone: (804) 708-0025
25   Reported by: Lisa Lineberry

52

1   presentence reports, and I know when they first come in

2   to DOC, but you learn a lot about an inmate through

3   prehearing, presentencing reports, such as their family

4   background, the behavior that got them where they were,

5   if there was any situations that may have led them to

6   commit or be -- to have committed the crime that they

7   committed. Plus, it helps me to see if the behavior

8   that they demonstrated on the street is continued, the

9   same behavior while they've been incarcerated.

10   Q   Did you ever read Mr. Givens' presentence

11   report?

12   A   I did.

13   Q   And how did that affect, if at all, your view

14   of Mr. Givens?

15   A   Well, I know that he had a --

16   Q   Not asking you what you knew, sir. The

17   question was how did that affect how you dealt with

18   him, if at all?

19   A   Oh, that's what I was trying to answer. Once

20   I read it, I knew he had a fall some time in his early

21   childhood development. I can't remember the age. That

22   told me he had a TBI, and that some of his erratic

23   behavior could be contributed to that TBI, which is

24   traumatic brain injury.

25   Q   Well, the -- that TBI is sometimes applied